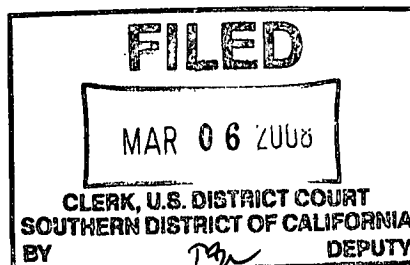


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8206

UNITED STATES OF AMERICA,
Plaintiff,

v.

Maria Laura LAMUG (1)
Jesus Juan Manuel ORTIZ (2)
Defendant.

Magistrate Case No.:
COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about March 5, 2008, within the Southern District of California, Maria Laura LAMUG and Jesus Juan Manuel ORTIZ did knowingly and intentionally import approximately 10.60 kilograms (23.32 pounds) of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Douglas Struckmeyer, Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO, BEFORE ME, AND SUBSCRIBED IN MY PRESENCE THIS
DAY OF MARCH, 2008.


PETER C. LEWIS
U.S. MAGISTRATE JUDGE

1
2 UNITED STATES OF AMERICA

3 v.

4 Maria Laura LAMUG (1)

5 Jesus Juan Manuel ORTIZ (2)

6 STATEMENT OF FACTS

7
8 This complaint is based upon the personal observations, investigation and
9 information provided to U. S. Immigration and Customs Enforcement Special Agent
10 Douglas Struckmeyer.
11

12 On March 5, 2008, Maria Laura LAMUG and Jesus Juan Manuel ORTIZ entered
13 the United States at the Calexico, California, West Port of Entry. LAMUG was the
14 driver and ORTIZ was the passenger of a 2003 Toyota Camry registered to LAMUG.
15

16 At the time of their entry, Customs and Border Protection Officer (CBPO) E.
17 Mayoral was assigned to primary vehicle inspection lane 2. At that time, Canine
18 Enforcement Officer (CEO) J. Jones was also conducting a pre-primary sweep of
19 vehicles using his Narcotic Detector Dog (NDD). As the vehicle driven by LAMUG
20 approached the inspection booth of lane 2, CEO Jones motioned to CBPO Mayoral that
21 he wanted the vehicle referred to vehicle secondary for further inspection. CBPO
22 Mayoral conducted a primary inspection, which included receiving a negative customs
23 declaration from LAMUG and ORTIZ, and then referred them for a secondary
24 inspection.
25

26
27 CBPO O. Ocegüera performed a secondary inspection of the vehicle. CBPO
28 Ocegüera first received a negative customs declaration from LAMUG and ORTIZ. He
29 then conducted a physical inspection of the interior of the vehicle. During this

1 inspection, he observed what he identified as a compartment built into the dash of the
2 vehicle.

3 Further inspection of the vehicle revealed the presence of a non-factory
4 compartment built into the vehicle's dash. A total of 18 packages were found
5 concealed within the compartment. The combined weight of the packages was
6 approximately 10.60 Kilograms (23.32 pounds). A sample taken from one of the
7 packages field tested positive for methamphetamine.
8

9 Special Agent's (S/A) Douglas Struckmeyer and Thomas Behm interviewed
10 LAMUG and ORTIZ. S/A Struckmeyer furnished each individual with their constitutional
11 rights per Miranda in English with S/A BEHM present. LAMUG orally waived her rights,
12 as well as signing the written waiver of rights, agreeing to make a statement.
13

14 LAMUG stated that she was approached by an individual who asked her if she
15 would be willing to smuggle a load of a controlled substance into the United States.
16 After she agreed to smuggle the controlled substance, the individual gave her contact
17 information to another individual, who later called her and instructed her to bring her
18 vehicle to Mexicali. She left the vehicle with the individual in Mexicali for approximately
19 four days before he contacted her again and instructed her to return to Mexicali and
20 pick up her vehicle. When she returned to Mexicali, the individual instructed her to
21 drive the vehicle into the United States and told her that he would call her with further
22 instructions after she successfully crossed the border.
23

24 LAMUG stated that she was going to be paid \$1,600 for smuggling the controlled
25 substance into the United States and that she believed the vehicle contained marijuana.
26 She also stated that she told ORTIZ the details of the plan prior to driving to Mexicali to
27 pick up the loaded vehicle.
28
29

1 ORTIZ did not make an initial statement, but he later made a spontaneous
2 statement that he was stupid for doing this and that people had warned him not to but
3 he did it anyway.
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